

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

KAYLA J. GILES

CIVIL ACTION NO. 1:19-cv-01173

VERSUS

CHIEF JUDGE DEE D. DRELL

DELTA DEFENSE, L.L.C., and
UNITED SPECIALTY INSURANCE COMPANY
Defendants

MAGISTRATE JUDGE JOSEPH
H.L. PEREZ-MONTES

PROPOSED PLAN OF WORK

On January 13, 2020, the following individuals participated in a meeting by telephone during which this Plan of Work was formulated:

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Part A

Based upon the information now reasonably available, the parties have agreed upon the following:

1. February 21, 2020 is the deadline for exchange of initial disclosures under Fed. Civ. P. 26(a).

2. April 24, 2020, is the deadline for filing dispositive motions
3. The parties do not anticipate the necessity for deadlines for adding additional parties, filing amended pleadings, employing experts, exchanging reports of experts, or taking of the depositions of experts, at this time.
4. The parties discussed the necessity for a protective order in light of the nature of the case and the publicity it has drawn.

Respectfully Submitted,

LAW OFFICE OF,

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